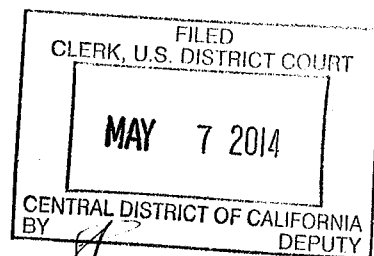


NADINE HAYS
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 Camarillo, CA 93010
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 (818) 474-7676 – Fax
 NadineHays@aol.com
 In Pro Se



**UNITED STATES DISTRICT COURT,
 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DISTRICT**

NADINE HAYS, an individual;

 Plaintiff,

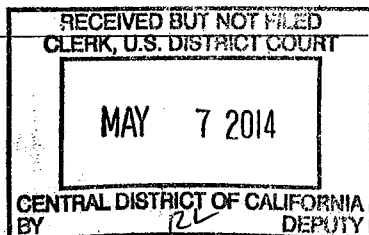
vs.

LOS ANGELES POLICE DEPARTMENT, et al

 Defendants

Case No. **CV12-10219 DMG (PJW)**
 Assigned for all purposes to:
 Judge: DMG (PJW)
 Dept: Currently Courtroom 23 for PJW

**PLAINTIFF'S REQUEST TO ADD
 DISCOVERED NAMES TO THIS
 LAWSUIT**



Original Complaint Filed: Nov. 19, 2012
 Trial Date: None
 Written Discovery Cut Off: May 5, 2014

Plaintiff, through Discovery, has been allowed to identify many of the Doe Defendants that violated her rights from which this lawsuit was created. It has recently been brought to Plaintiff's attention that these now named Defendants have not been officially added to this lawsuit. Plaintiff would like to do that at this time.

**PLAINTIFF'S REQUEST TO ADD DISCOVERED NAMES TO THIS
 LAWSUIT**

The easiest way to do this for Plaintiff is to go through each of the Incidents cited in the complaint. Plaintiff has listed each of the Defendants in the Incident they were involved in. All new Defendants have been marked with an asterick (*) after their name and these are the Defendants that need to be added. Plaintiff has also noted Defendants which she has dismissed, without prejudice, at this time.

December 2, 2011 – Harassment by LAPD

1. DOE 1, who was the chief fireman who arrived on the scene after having been called, has been identified as Reuben Navarro. Plaintiff, after having a conversation with Navarro, now understands that he was merely doing his job and had no ulterior motive to harass Plaintiff. His biggest concern was the spare gas can and where it was located. He emphasized to Plaintiff that the muffler from the generator can get very hot and if it is too close to a gas can an explosion can occur. Plaintiff will not be naming Reuben Navarro in this lawsuit, although she will admit that he could have been more tactful and informative on the date of the incident.
2. DOE 2, who is the individual that called for the fire truck to come out, has not as of yet been identified.

December 4, 2011 – Harassment by LAPD officers

VERGARA

RODRIQUEZ

December 15, 2011

MONTGOMERY

January 3, 2012

GUILLEN

**PLAINTIFF'S REQUEST TO ADD DISCOVERED NAMES TO THIS
LAWSUIT**

DOMINGUEZ

March 7, 2012

KIM*

NICHOLS*

March 8, 2012: Plaintiff was arrested by Captain Horace Frank for displaying merchandise on the sidewalk

FRANK

GONZALEZ*

RAMIREZ*

DOES not yet named

April 25, 2012

NAVARRO

ECHAVERRIA

PRUDE

FLORES*

GUADIANA*

KHAMIS*

LEFFEY*

PARKER*

VACA*

WALKER*

WILLIS*

CRUMP*; correction to heading which said GUMP

**PLAINTIFF'S REQUEST TO ADD DISCOVERED NAMES TO THIS
LAWSUIT**

1 Detectives:

2 BRAUSAM

3 DE LA COVA

4 Interviewer For City Attorney's Office:

5 VARGAS

6 Supervisory to Internal Affairs Complaints:

7 SWARTZER

8 Jailers at Metro Detention Center:

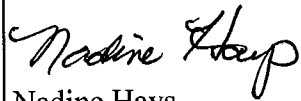
9 FOWLER

10 BIRCH

11 CORONADO

12 In summary, because many of the Doe Defendants have now been named, Plaintiff needs
13 to add the following names to her list of Defendants in this lawsuit: KIM, NICHOLS,
14 GONZALEZ, RAMIREZ, FLORES, GUADIANA, KHAMIS, LEFFEW, PARKER, VACA,
15 WALKER, and WILLIS. Plaintiff needs to correct the spelling of one officer from GUMP to
16 CRUMP. Officers originally named in this lawsuit that have been dismissed without prejudice
17 by Plaintiff are DELGADO and MACIAS. Bank of America has also been dismissed without
18 prejudice.

19 Respectfully submitted,

20 

21 Nadine Hays

22 Plaintiff, In Pro Se

23 Dated: 5/5/2014

24
25 **PLAINTIFF'S REQUEST TO ADD DISCOVERED NAMES TO THIS**
26 **LAWSUIT**

PROOF OF SERVICE – CIVIL

1. At the time of service I was over 18 years of age and not a party to this action. My residence address is: 370 Highland Hills Dr.; Camarillo, CA 93010.
2. Case: CV 12-10219 DMG(PJW)
3. On May 5, 2014 I served a copy of the following document:

PLAINTIFF'S REQUEST TO ADD DISCOVERED NAMES TO THIS LAWSUIT;
dated 5/5/2012

4. Person served:

Elizabeth Greenwood
Deputy City Attorney
200 North Main Street, 6th Floor, City Hall East
Los Angeles, CA 90012

Lisa Garner
Gordon and Rees, LLP
633 W. Fifth Street
52nd Floor
Los Angeles, CA 90071

Served via U.S. mail.

Date: May 5, 2014

Signed: _____

John A. Hays

PROOF OF SERVICE